

EXHIBIT 29

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION MDL No. 2804
OPIATE LITIGATION Case No. 17-md-2804

This document relates to: Judge Dan
 Aaron Polster

The County of Cuyahoga v. Purdue
Pharma, L.P., et al.
Case No. 17-OP-45005

City of Cleveland, Ohio vs. Purdue
Pharma, L.P., et al.
Case No. 18-OP-45132

The County of Summit, Ohio,
et al. v. Purdue Pharma, L.P.,
et al.
Case No. 18-OP-45090

VOLUME I
Videotaped Deposition of Kyle J. Wright
Washington, D.C.
February 28, 2019
9:33 a.m.

Reported by: Bonnie L. Russo
Job No. 3244302

1 manufacturer would have visibility at the
2 doctor-patient level?

3 A. Under certain circumstances.
4 Because the manufacturers could be ordering
5 particular products and obtain them directly
6 from a manufacturer.

7 There were also programs where they
8 got rebates and other things like this. And so
9 they also knew. There were certain limited
10 circumstances in which manufacturer community
11 could -- community could see downstream. It's
12 limited.

13 Q. Limited circumstances?

14 A. Yes, ma'am.

15 Q. Okay. And would distributors have
16 visibility or know about the doctor-patient
17 relationships?

18 MR. SHKOLNIK: Objection to form.

19 MR. MIGLIORI: Objection to form.

20 THE WITNESS: Not in totality.

21 BY MS. MAINIGI:

22 Q. So to be clear, a distributor would
23 not know anything about the doctor-patient
24 relationship, correct?

25 MR. MIGLIORI: Objection.

1 THE WITNESS: On a specific
2 doctor-patient relationship, no.

3 MS. McCLURE: Can we go off the
4 record for a minute. The live feed stopped
5 working a few questions ago.

6 THE VIDEOGRAPHER: We are going off
7 the record.

8 This is the end of Media Unit No. 1.
9 The time is 10:37.

10 (A short recess was taken.)

11 THE VIDEOGRAPHER: We are going back
12 on the record.

13 This is the beginning of Media Unit
14 2.

15 The time is 10:48.

16 You may proceed, Counsel.

17 BY MS. MAINIGI:

18 Q. Mr. Wright, you recall mentioning
19 earlier that you were transferred to DEA
20 headquarters around 2005, I think April Fool's
21 Day 2005, right?

22 A. Yes.

23 Q. Now, at the time that you moved over
24 to DEA headquarters, was there a system in
25 place called the Excessive Purchase Program?